

Sage Legal LLC

18211 Jamaica Avenue • Jamaica, NY 11423-2327 • (718) 412-2421 • emanuel@sagelegal.nyc

March 5, 2025

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Nusrat J. Choudhury, U.S.D.J.
100 Federal Plaza, Courtroom 1040
Central Islip, NY 11722-4438

Re: Deo, *et al.* v. Baron, *et al.*
Case No.: 2:24-cv-6903 (NJC) (JMW)

Dear Judge Choudhury:

This office represents Defendant Superb Motors Inc. (“Superb”) in the above-referenced case. Superb writes together with the remaining Defendants to request an extension of time to: (i) address Defendants’ Nissan Motor Acceptance Company LLC’s (“NMAC”), Ally Financial Inc.’s (“Ally”), and Next Gear Capital Inc.’s (“Next Gear”) (NMAC, Ally, and Next Gear collectively hereinafter the “Financing Defendants”) letter motion (ECF Docket Entry [69](#)); and (ii) respond to the Plaintiffs’ complaint.

Pursuant to ¶ 1.7.1 of this Court’s Individual Rules for Civil and Criminal Cases, Defendants submit that:

(i) the reason for the request is to permit the remaining Defendants to address the Financing Defendants’ letter motion in a single response;

(ii) the original date a response is due falls on March 5, 2025 pursuant to Local Civil Rule 6.1;

(iii-iv) there have been no previous requests for an extension of time to respond to the Financing Defendants’ letter motion to stay, but there has been at least one request by all of the appearing Defendants to respond to the complaint;

(v) NMAC and Ally do not object to the request, and Next Gear has not provided a response despite three (3) requests from your undersigned; and

(vi) the Defendants propose March 19, 2025 as the date to respond to the Financing Defendants’ letter motion for a stay.

In addition, all of the Defendants in this case request that the deadline to respond to the complaint, including the briefing schedule set forth in this Court’s November 20, 2024 Order, be stayed or extended *sine die* pending the status of the Financing Defendants’ letter motion.

For the foregoing reasons, Defendants respectfully submit that there is good cause for this Court to exercise its discretion in favor of granting the requested extensions of time. See Fed. R. Civ. P. 6(b)(1)(A).

Defendants thank this Court for its time and attention to this case.

Dated: Jamaica, New York
March 5, 2025

Respectfully submitted,

SAGE LEGAL LLC

By: /s/ Emanuel Kataev, Esq.
Emanuel Kataev, Esq.
18211 Jamaica Avenue
Jamaica, NY 11423-2327
(718) 412-2421 (office)
(917) 807-7819 (cellular)
(718) 489-4155 (facsimile)
emanuel@sagelegal.nyc

*Attorneys for Defendant
Superb Motors Inc.*

VIA ECF
All counsel of record